

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SOO LINE RAILROAD CO.)	
d/b/a CANADIAN PACIFIC RAILWAY)	
)	
Plaintiff,)	
)	Civil Action No. 08-CV-1813
v.)	Judge Der-Yeghiayan
)	Magistrate Judge Cox
BROTHERHOOD OF MAINTENANCE OF WAY)	
EMPLOYES DIVISION OF THE INTERNATIONAL)	
BROTHERHOOD OF TEAMSTERS)	
)	
Defendant.)	
)	

NOTICE OF MOTION

On June 19, 2008 at 9:00 a.m. or as soon thereafter as counsel may be heard, we will appear before the Honorable Judge Samuel Der-Yeghiayan at the Dirksen Federal Building, 219 South Dearborn Street, Chicago, IL, and present Brotherhood of Maintenance of Way Employees Division's

MOTION TO DISMISS COMPLAINT FOR LACK OF SUBJECT MATTER JURISDICTION.

Respectfully submitted,

Of Counsel:

William A. Bon, Esq.

General Counsel

Brotherhood of Maintenance

Of Way Employees Division/IBT

20300 Civic Center Dr. Suite 320

Southfield, MI 48076-4169

(248) 948-1010

Richard S. Edelman

O'Donnell, Schwartz & Anderson, P.C.

1900 L Street, N.W., Suite 800

Washington, DC 20036

Telephone: (202) 898-1824

Facsimile: (202) 429-8928

REdelman@odsawalaw.com

June 17, 2008

s/ William L. Phillips

William L. Phillips

Attorney at Law

100 N. LaSalle St. Suite 1605

Chicago, IL 60602

Telephone: (847) 644-1901

Facsimile: (312) 332-9595

bill@wlphillips.com

Attorneys for Defendant

Brotherhood of Maintenance of Way Employees

Division/IBT

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2008, a copy of the foregoing Answer was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this document through the Court's system.

s/ William L. Phillips